

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA**

SHERRY ADAMS,
Plaintiff,

v.

HOLLER LAW FIRM LLC,
a Connecticut corporation,
Defendant.

FEDERAL COURT CASE NO:

STATE CASE NO:
2023CV375242

DEFENDANT’S CERTIFICATE OF INTERESTED PERSONS
AND CORPORATE DISCLOSURE STATEMENT

Defendant, Holler Law Firm, LLC (hereinafter “Holler”), by and through its undersigned counsel, herby submits the following Certificate of Interested Persons and Corporate Disclosure Statement, and in support thereof, Holler makes the following disclosures:

1. The undersigned counsel of record for a party or proposed intervenor to this action certifies that the following is a full and complete list of all parties, including proposed intervenors, in this action, including any parent corporation and any publicly held corporation that owns 10% or more of the stock of a party or proposed intervenor:

a. Defendant, Holler Law Firm, LLC, a Connecticut corporation;

b. Plaintiff, Sherri Adams, according to her Complaint, is a resident of the State of Georgia

2. The undersigned further certifies that the following is a full and complete list of all other persons, associations, firms, partnerships or corporations having either a financial interest in or other interest which could be substantially affected by the outcome of this case:

a. N/A

3. The undersigned further certifies that the following is a full and complete list of all persons serving as attorneys for the parties, including proposed intervenors, in this case:

a. Charles Eric Burkett, Esq. (GA Bar ID #142557) for Defendant;

b. Deborah P. Everett, Esq. (*pro hac vice* application forthcoming) for Defendant;

c. Timothy J. Wilson, Esq. (*pro hac vice* application forthcoming) for Defendant

d. Upon information and belief, Plaintiff Sherry Adams is appearing *pro se*.

4. The undersigned further certifies that the following is a full and complete list of citizenship¹ of every individual or entity whose citizenship is attributed to a party or proposed intervenor on whose behalf this certificate is filed:

- a. Holler Law Firm, a Connecticut Corporation with a principal place of business and corporate headquarters at 185 Plains Road, Suite 100W, Milford, CT 06461;
- b. George Holler, Holler Law Firm majority shareholder, domiciled and a citizen of the State of Connecticut;
- c. Jane Holler, Holler Law Firm shareholder, domiciled and a citizen of the State of Connecticut.²

Submitted this 27th day of February, 2023.

¹ Allegations of an individual's residence do not enable the Court to determine an individual's citizenship. *Travaglio v. Am. Express Co.*, 735 F.3d 1266, 1269 (11th Cir 2013). For purposes of diversity jurisdiction, citizenship is equivalent to domicile, which is the party's "true, fixed, and permanent home and principal establishment, and to which he has the intention of returning whenever he is absent therefrom." *McCormick v. Anderholt*, 293 F.3d 1254, 1257-58 (11th Cir. 2002)(quoting *Mas v. Perry*, 489 F.2d 1396, 1399 (5th Cir. 1974)).

"[A] limited partnership is a citizen of each state in which any of it's partners, limited or general, are citizens." *Rolling Greens MHP, L.P. v. Comcast SCH Holdings L.L.C.*, 374 F.3d 1020, 1021 (11th Cir. 2004)(citing *Carden v. Arkoma Assocs.*, 494 U.S. 185, 195-196)).

A limited liability company, like other unincorporate entities, "is a citizen of any state of which a member of the company is a citizen." *Rolling Greens MHP*, 374 F.3d at 1022.

A traditional trust is a citizen of the state of which its trustee is a citizen, not its beneficiaries. *Alliant Tax Credit 3I, Inc. v. Murphy*, 924 F.3d 1134, 1143 (11th Cir. 2019).

² If the Court desires the addresses of Mr. and Mrs. Holler, Defendant can provide same for an *in camera* review.

RESPECTFULLY SUBMITTED,

/s/ Charles Eric Burkett, Esq.

Charles Eric Burkett, Esq.

Georgia Bar No. 142557

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